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STATE OF VERMONT ATTORNEY GENERAL'S OFFICE

Christopher V. Raupers, Esq. Associate craupers@lbcclaw.com

January 12, 2020

VIA U.S. MAIL

Vermont Office of the Attorney General Attn: Records 109 State St Montpelier, VT 05609

> RE: Records request as to Palmco Power, Palmco Energy, Verde Energy, Indra Energy, and/or Columbia Utilities

Dear Sir or Madam,

Please accept this correspondence as a request under Vermont's Public Records Act, 1 V.S.A. §§ 315-320. This request seeks information as to a national gas and electric company known as Palmco. They may have operated or applied to operate in your state as Palmco Power VT LLC, Palmco Energy VT LLC, Columbia Utilities, Verde Energy, Indra Energy, or simply Palmco (collectively "Palmco"). As such, when Palmco is referenced in this request, it is directed to qualifying records as to each name under which Palmco does business. Further, when your office (the "Attorney General") is referenced below, said request is directed to not only your state's Office of the Attorney General, but also to any of the departments under its umbrella, including but not limited to any Consumer Protection Department.

RECORDS REQUESTED

- 1. Any and all written communications between the Attorney General and Palmco regarding investigations of Palmco by the Attorney General as to Palmco's marketing practices, pricing practices, or any other practices or potential violations of law.
- 2. Any and all written communications between the Attorney General and any state entity, including consumer protection divisions and public utility commissions, regarding investigations of Palmco by the Attorney General as to Palmco's marketing practices, pricing practices, or any other practices or potential violations of law.
- 3. Any and all written communications between the Attorney General and any party not referenced above regarding investigations of Palmco as to Palmco's marketing practices, pricing practices, or any other practices or potential violations of law.

- 4. Any and all documents exchanged between the Attorney General and Palmco regarding investigations of Palmco as it relates to marketing, pricing, or any violation of law.
- 5. Any and all formal filings by the Attorney General against Palmco regarding investigations of Palmco by the Attorney General as to Palmco's marketing practices, pricing practices, or any other practices or potential violations of law.
- 6. Any and all press releases by the Attorney General as to Palmco at any time.
- 7. Any and all records of payments made by Palmco to the Attorney General as it relates to investigations of Palmco as to marketing practices, pricing practices, or any other practices or potential violations of law.
- 8. Any and all records of payments by Palmco to any state agency as it relates to investigations of Palmco regarding its marketing practices, pricing practices, or any other practices or potential violations of law.
- 9. Any and all internal memoranda by the Attorney General as to investigations of Palmco regarding its marketing practices, pricing practices, or any other practices or potential violations of law.
- 10. Any and all documents exchanged between Palmco and the Attorney General in furtherance of investigations of Palmco as it relates to marketing, pricing, or any potential violation of law, including but not limited to documents provided by Palmco to the Attorney General in furtherance of participating in any state investigation.
- 11. Any and all audio or video recordings of interviews, meetings, or other communications between representatives of the Attorney General and representatives of Palmco.
- 12. Any and all settlement agreements, assurances of discontinuance, or other agreements entered into between Palmco and the Attorney General.
- 13. Any and all settlement agreements entered into between Palmco and any party which are in the possession of the Attorney General.
- 14. Any and all records of consumer complaints as to Palmco in the possession of the Attorney General.
- 15. Any and all records of criminal filings or investigations into agents, servants, or assigns of Palmco within the possession of the Attorney General.
- 16. Any and all records of investigations performed by the Attorney General as to Palmco, which were not produced in response to one of the above demands.

If you deem any of the above records to be exempt from disclosure, please provide a response containing the rationale for same. If you have any questions or concerns, please feel free to contact the undersigned at your convenience.

Very truly yours,

L'ABBATE, BALKAN, COLAVITA & CONTINI, L.L.P.

Christopher V. Raupers CHRISTOPHER V. RAUPERS, ESQ.

CVR/rs